

EXHIBIT 7

UBER MDL DRAFT DISCOVERY SCHEDULE

1	April 18, 2024	<p>Uber shall provide (1) a list of proposed custodians. For each custodian, Uber shall provide all job titles and dates for which the custodian held that title, as well as the date(s) for any litigation holds; (2) provide a list of non-custodial files that can be produced without the use of search terms and a date certain for production.</p> <p>Plaintiffs will produce a list of proposed search terms</p>
2	April 19, 2024	Meet and confer re: Uber's proposed list of custodians and production of non-custodial files.
3	April 23, 2024	<p>Uber shall:</p> <p>(1) serve any initial objections to First RFPs that would result in the withholding of large portions of documents (i.e., objections that would be made to multiple First RFPs); (2) identify any First RFPs that objects to into their entirety; (3) identify any First RFPs that are fully covered by documents already produced in the JCCP and provide a date certain for producing those documents to Plaintiffs.</p> <p>Plaintiffs will submit a proposed list of initial custodians. Uber shall respond by April 30 as to whether they will produce documents for those custodians.</p> <p>Additionally, Uber will propose search terms.</p>
4	April 26, 2024	Uber shall identify the custodians for which Uber will produce documents.

5	April 29, 2024	<p>Plaintiffs will provide a proposed schedule for responding to First RFP's which will identify First RFPs to respond to by either May 10, 2024 or May 29, 2024.</p> <p>Meet and confer re: Uber's initial objections to First RFPs, production of JCCP documents, Plaintiffs' proposed schedule for First RFP responses, and search terms.</p>
6	May 1, 2024	Meet and confer regarding search terms, custodians, and responses to First RFPs.
7	May 3, 2024	Final meet and confer regarding search terms, custodians, and responses to First RFPs.
8	May 7, 2024	The parties will submit any dispute over search terms or custodians to the Court.
9	May 15, 2024	Uber shall serve responses and begin a rolling production of documents pursuant to Plaintiffs' April 29 proposal and the parties' April 29 and May 1 discussions.
10	May 29, 2024	Uber shall any serve final responses and objections to the First RFPs, Interrogatories and RFAs

16	September 1, 2024	Uber substantially complete productions of non-privileged responsive documents in response to First Set of RFPs
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